



Depend on our people. Count on our advice.SM

REDACTED - FOR PUBLIC INSPECTION

June 30, 2014

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Received & Inspected
JUN 30 2014
FCC Mail Room

ATTENTION: WIRELINE COMPETITION BUREAU

RE: Form 481 ETC filing pursuant to Sections 54.313 and 54.422
SAC 351225, IA, Lehigh Valley
Connect America Fund WC Dockets 10-90, 11-42 and 14-58

Dear Ms. Dortch:

Pursuant to Sections 54.313 and 54.422 of Commission's Rules, Lehigh Valley, IA, SAC 351225 is filing its Form 481 High Cost and Low-Income Annual Report.

Lehigh Valley seeks confidential treatment under the Protective Order in this proceeding for Section 54.313(f)(2) financial information in the 481 filing ¹ and for Section 54.202(a) 5 Year Service Quality Improvement Plan portion of the 481 filing pursuant to the Request for Confidential Treatment attached to this filing. Pursuant to the Protective Order, one copy of the confidential document and two copies of the redacted version are provided. The Redacted version is also being filed on the Electronic Comment Filing System.

Please address any correspondence regarding this transmittal to the attention of Tom Campbell at the following address, e-mail or telephone number.

Sincerely,

Tom Campbell
Telecommunications Consultant
tcampbell@otcpas.com
651-621-8511 (v)
651-483-2467 (f)

No. of Copies rec'd 04
List ABCDE

Enclosures

CC: Mr. Charles Tyler, FCC Telecommunications Access Policy Division (two copies confidential)

¹ See Protective Order 27, WC Docket Nos. 10-90 et al, Rec 14231 rel. November 16 ("Order")

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

*Received & Inspected
JUN 30 2014
FCC Mail Room*

| | | |
|---------------------------------------|---|---------------------|
| In the Matter of |) | |
| |) | |
| Connect America Fund |) | WC Docket No. 10-90 |
| |) | |
| Lifeline and Link Up Reform |) | WC Docket No. 11-42 |
| |) | |
| ETC Annual Reports and Certifications |) | WC Docket No. 14-58 |

REQUEST FOR CONFIDENTIAL TREATMENT

Lehigh Valley Cooperative Telephone Association, SAC 351225, ("the company") requests that the portion of its Form 481 pertaining to the 5-Year Service Quality Improvement Plan be granted confidential, non-public treatment pursuant to Sections 0.457 and 0.459 of the Commission's rules, 47 C.F.R. §§ 0.457, 0.459, and related provisions of the Freedom of Information Act ("FOIA"), including 5 U.S.C. § 552(b)(4) ("Exemption 4"). Form 481 contains information regarding the company's Section 54.202(a) 5- Year Service Quality Improvement Plan including capital expenditures and operating expenses. Release of such information would supply a roadmap to competitors regarding confidential build out plans and study area demographics. In addition, the document contains confidential information that is not customarily disclosed to the public or made available within the telecommunications industry. Information in support of the company's request for confidential treatment pursuant to Section 0.459(b) of the Commission's Rules, 47 C.F.R. § 0.459(b), is provided below.

I. LEHIGH VALLEY COOPERATIVE TELEPHONE ASSOCIATION'S FORM 481 SATISFIES THE REQUIREMENTS OF § 0.459 OF THE COMMISSION'S RULES

The material for which the company seeks confidentiality falls squarely within the requirements of Section 0.459 of the Commission's rules. As demonstrated below, the company has satisfied each of the elements of Section 0.459, and disclosure of this information would result in competitive harm to the company.

(1) Identification of the specific information for which confidential treatment is sought. The company requests confidential treatment for the portion of Form 481 required by 47 C.F.R. § 54.313 related to the Section 54.202(a) 5- Year Service Quality Improvement Plan. The information bears the legend "Confidential Financial Information. The specific information falls into the categories of: 1. Capital Expenditures, 2. Operating Expenses and 3. Area Demographics

(2) Identification of the Commission proceeding in which the information was submitted or a description of the circumstances giving rise to the submission. The information is required to be produced annually by 47 C.F.R. § 54.313. The proceedings are WC Docket No. 10-90 and WC Docket No. 11-42. The documents will also be submitted in WC Docket NO. 14-58

(3) Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged. The information for which confidentiality is requested is "financial" and commercial¹ in nature. The information is "confidential" in that it "would customarily not be released to the public."² The courts have elaborated that material "is 'confidential' . . . if disclosure of the information is likely to have either the following effects: (1) to impair the government's ability to obtain necessary information in the future; or (2) to cause substantial harm to the competitive position of the person from whom the information was obtained."³ Both of the considerations apply in this instance, as further explained in point (5) below.

(4) Explanation of the degree to which the information concerns a service that is subject to competition. All of the services provided by the company are subject to intense existing or potential competition.

¹ See *Board of Trade of the City of Chicago v. Commodity Futures Trading Comm'n*, 627 F.2d 392, 403 & n.78 (D.C. Cir. 1980) (courts have given the terms "commercial" and "financial, as used in Section 552(b)(4), their ordinary meanings).

² *Critical Mass Energy Project v. NRC*, 975 F.2d 871, 873 (D.C. Cir. 1992) (citing the Senate Committee Report).

³ *Nat'l Parks and Conservation Ass'n v. Morton*, 498 f.2d 764, 770 (D.C. Cir. 1974) (footnote omitted); see also *Critical Mass Energy*, 975 F.2d at 873.

(5) Explanation of how disclosure of the information could result in substantial competitive harm. If the information were publicly available, it would supply competitors with financial information not ordinarily available to the public. Specifically, rural telephone service has historically lent itself to "cherry picking" by competitors that choose to only serve low cost areas. Release of this specific build out and operating expense information would allow competitors to gain an unfair advantage.

(6) Identification of any measures taken by the submitting party to prevent unauthorized disclosure. The information for which the company seeks confidential treatment is information that the company does not customarily release to the public. The company also limits the internal circulation of this information to only those with a need to know.

Consistent with 47 C.F.R. § 0.459(a), the items for which confidentiality is requested are being submitted with, and are covered by, this request. This request for confidentiality - as well as the documents subject to this request - are being filed in hard copy and/or electronic copy.

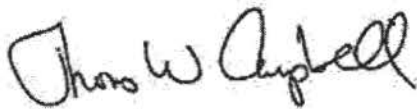
(7) Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties. The documents and information for which confidentiality is sought are not made available to the public and have not been disclosed to third parties, except to those entities identified in 47 C.F.R. § 54.313(i). For those disclosures, the company has requested confidential treatment by the entities for the same information.

(8) Justification of the period during which the submitting party asserts that material should not be available for public disclosure. Given the sensitive nature of the information for which confidentiality is requested, the prospect of serious competitive harm, the company requests that confidential treatment apply indefinitely.

II. CONCLUSION

For these reasons, pursuant to Sections 0.457 and 0.459 of the Commission's Rules, the company requests that the portion of Form 481 relating to the Section 54.202(a) 5 - Year Service Quality Improvement Plan be treated as confidential under the Commission's rules and precedent and withheld in their entirety from public inspection, and that any distribution of them within the Commission should be limited to a "need to know" basis. In the event that any person or entity requests access to the documents or seeks to make any or all of them part of the public record, the company requests to be notified immediately so that it can oppose such request or take other action as necessary to safeguard its interests and the interests of consumers.

Sincerely,

A handwritten signature in black ink, appearing to read "Tom W. Campbell". The signature is stylized with a large, looped initial "T" and a cursive "W".

Tom Campbell

Telecommunications Consultant

tcampbell@otcpas.com

651-621-8511 (v)

651-483-2467 (f)

| | | |
|---|---|--|
| FCC Form 481 - Carrier Annual Reporting Data Collection Form | REDACTED - FOR PUBLIC INSPECTION | FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013 |
|---|---|--|

| | | |
|---|----------------------|----------------------|
| <010> Study Area Code | 351225 | |
| <015> Study Area Name | LEHIGH VALLEY COOP | Received & Inspected |
| <020> Program Year | 2015 | JUN 30 2014 |
| <030> Contact Name: Person USAC should contact with questions about this data | Tom Campbell | |
| <035> Contact Telephone Number: Number of the person identified in data line <030> | 6516218511 ext. | FCC Mail Room |
| <039> Contact Email Address: Email of the person identified in data line <030> | tcampbell@otcpas.com | |

| ANNUAL REPORTING FOR ALL CARRIERS | | | 54.313 Completion Required | 54.422 Completion Required |
|--|---|--|-------------------------------------|-------------------------------------|
| | | | (check box when complete) | |
| <100> Service Quality Improvement Reporting | (complete attached worksheet) | | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <200> Outage Reporting (voice) | (complete attached worksheet) | | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <210> <input checked="" type="checkbox"/> <- check box if no outages to report | | | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <300> Unfulfilled Service Requests (voice) | 0 | | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <310> Detail on Attempts (voice) | | | <input type="checkbox"/> | <input type="checkbox"/> |
| | (attach descriptive document) | | | |
| <320> Unfulfilled Service Requests (broadband) | 0 | | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <330> Detail on Attempts (broadband) | | | <input type="checkbox"/> | <input type="checkbox"/> |
| | (attach descriptive document) | | | |
| <400> Number of Complaints per 1,000 customers (voice) | | | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <410> Fixed | 0.0 | | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <420> Mobile | 0.0 | | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <430> Number of Complaints per 1,000 customers (broadband) | | | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <440> Fixed | 0.0 | | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <450> Mobile | 0.0 | | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <500> Service Quality Standards & Consumer Protection Rules Compliance | (check to indicate certification) | | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <510> 351225ia510.pdf | (attach descriptive document) | | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <600> Functionality in Emergency Situations | (check to indicate certification) | | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <610> 351225ia610.pdf | (attach descriptive document) | | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <700> Company Price Offerings (voice) | (complete attached worksheet) | | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <710> Company Price Offerings (broadband) | (complete attached worksheet) | | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <800> Operating Companies and Affiliates | (complete attached worksheet) | | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <900> Tribal Land Offerings (Y/N)? | (if yes, complete attached worksheet) | | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <1000> Voice Services Rate Comparability | (check to indicate certification) | | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <1010> 351225ia1010.pdf | (attach descriptive document) | | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <1100> Terrestrial Backhaul (Y/N)? | (if not, check to indicate certification) | | <input type="checkbox"/> | <input type="checkbox"/> |
| <1110> | (complete attached worksheet) | | <input type="checkbox"/> | <input type="checkbox"/> |
| <1200> Terms and Condition for Lifeline Customers | (complete attached worksheet) | | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

| | | | |
|--------|-----------------------------------|--------------------------|--------------------------|
| <2000> | (check to indicate certification) | | |
| <2005> | (complete attached worksheet) | <input type="checkbox"/> | <input type="checkbox"/> |

Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet

| | | | |
|--------|-----------------------------------|-------------------------------------|--------------------------|
| <3000> | (check to indicate certification) | | |
| <3005> | (complete attached worksheet) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

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Page 2

(100) Service Quality Improvement Reporting Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

| | | |
|-------|---|----------------------|
| <010> | Study Area Code | 351225 |
| <015> | Study Area Name | LEHIGH VALLEY COOP |
| <020> | Program Year | 2015 |
| <030> | Contact Name - Person USAC should contact regarding this data | Tom Campbell |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 6516218511 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | tcampbell@otcpas.com |

| | | |
|--|---|---|
| <110> | Has your company received its ETC certification from the FCC? | (yes / no) <input type="radio"/> <input checked="" type="radio"/> |
| If your answer to Line <110> is yes, do you have an existing §54.202(a) "5 | | |
| <111> | year plan" filed with the FCC? | (yes / no) <input type="radio"/> <input type="radio"/> |

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.

3512251a112.pdf

Name of Attached Document

Please check these boxes below to confirm that the attached documents(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to § 54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

| | | |
|-------|---|-------------------------------------|
| <113> | Maps detailing progress towards meeting plan targets | <input type="checkbox"/> |
| <114> | Report how much universal service (USF) support was received | <input checked="" type="checkbox"/> |
| <115> | How (USF) was used to improve service quality | <input checked="" type="checkbox"/> |
| <116> | How (USF) was used to improve service coverage | <input checked="" type="checkbox"/> |
| <117> | How (USF) was used to improve service capacity | <input checked="" type="checkbox"/> |
| <118> | Provide an explanation of network improvement targets not met in the prior calendar year. | <input type="checkbox"/> |

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| | |
|--|--|
| (200) Service Outage Reporting (Voice) Data Collection Form | FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013 |
|--|--|

| | | |
|-------|---|----------------------|
| <010> | Study Area Code | 351225 |
| <015> | Study Area Name | LEHIGH VALLEY COOP |
| <020> | Program Year | 2015 |
| <030> | Contact Name - Person USAC should contact regarding this data | Tom Campbell |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 6516218511 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | tcampbell@otcpas.com |

[illegible]

Page 4

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

| | | |
|-------|---|----------------------|
| <010> | Study Area Code | 351225 |
| <015> | Study Area Name | LEHIGH VALLEY COOP |
| <020> | Program Year | 2015 |
| <030> | Contact Name - Person USAC should contact regarding this data | Tom Campbell |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 6516218511 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | tcampbell@otcpas.com |

<701> Residential Local Service Charge Effective Date
<702> Single State-wide Residential Local Service Charge

1/1/2014

[illegible]

(710) Broadband Price Offerings Data Collection Form FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

| | | |
|-------|---|----------------------|
| <010> | Study Area Code | 351225 |
| <015> | Study Area Name | LEHIGH VALLEY COOP |
| <020> | Program Year | 2015 |
| <030> | Contact Name - Person USAC should contact regarding this data | Tom Campbell |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 6516218511 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | tcampbell@otepas.com |

[illegible]

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(800) Operating Companies
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986 / OMB Control No. 3060-0819
July 2013

| | | |
|-------|---|--|
| <010> | Study Area Code | 351225 |
| <015> | Study Area Name | LEHIGH VALLEY COOP |
| <020> | Program Year | 2015 |
| <030> | Contact Name - Person USAC should contact regarding this data | Tom Campbell |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 6516218511 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | tcampbell@otcpas.com |
| <810> | Reporting Carrier | Valley Coop Telephone Association |
| <811> | Holding Company | Lehigh Valley Coop Telephone Association |
| <812> | Operating Company | Valley Coop Telephone Association |

[illegible]

(900) Tribal Lands Reporting
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

| | | |
|-------|---|----------------------|
| <010> | Study Area Code | 351225 |
| <015> | Study Area Name | LEHIGH VALLEY COOP |
| <020> | Program Year | 2015 |
| <030> | Contact Name - Person USAC should contact regarding this data | Tom Campbell |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 6516218511 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | tcampbell@otcpas.com |

<910> Tribal Land(s) on which ETC Serves

<920> Tribal Government Engagement Obligation

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

| Select (Yes, No, NA) |
|----------------------------|
| |
| |
| |
| |
| |
| |
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| |
| |
| |

(1100) No Terrestrial Backhaul Reporting
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

| | | |
|-------|---|----------------------|
| <010> | Study Area Code | 351225 |
| <015> | Study Area Name | LEHIGH VALLEY COOP |
| <020> | Program Year | 2015 |
| <030> | Contact Name - Person USAC should contact regarding this data | Tom Campbell |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 6516218511 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | tcampbell@otcpas.com |

<1120> Please check this box to confirm no terrestrial backhaul options exist within the supported area pursuant to § 54.313(G) ☐

<1130> Please check this box to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(G) ☐

(1200) Terms and Condition for Lifeline Customers
Lifeline
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

| | | |
|-------|---|----------------------|
| <010> | Study Area Code | 351225 |
| <015> | Study Area Name | LEHIGH VALLEY COOP |
| <020> | Program Year | 2015 |
| <030> | Contact Name - Person USAC should contact regarding this data | Tom Campbell |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 6516218511 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | tcampbell@otcpas.com |

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

Name of Attached Document

<1220> Link to Public Website

HTTP

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

<1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, ☒

<1222> Details on the number of minutes provided as part of the plan, ☒

<1223> Additional charges for toll calls, and rates for each such plan. ☒

(2000) Price Cap Carrier Additional Documentation

Data Collection Form

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

| | | |
|-------|---|----------------------|
| <010> | Study Area Code | 351225 |
| <015> | Study Area Name | LEHIGH VALLEY COOP |
| <020> | Program Year | 2015 |
| <030> | Contact Name - Person USAC should contact regarding this data | Tom Campbell |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 6516210511 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | tcampbell@otcpas.com |

CHECK the boxes below to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e) the information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting

- <2010> 2nd Year Certification (47 CFR § 54.313(b)(1)) ☐
- <2011> 3rd Year Certification (47 CFR § 54.313(b)(2)) ☐

Price Cap Carrier Receiving Frozen Support Certification (47 CFR § 54.312(a))

- <2012> 2013 Frozen Support Certification ☐
- <2013> 2014 Frozen Support Certification ☐
- <2014> 2015 Frozen Support Certification ☐
- <2015> 2016 and future Frozen Support Certification ☐

Price Cap Carrier Connect America ICC Support (47 CFR § 54.313(d))

- <2016> Certification Support Used to Build Broadband ☐

Connect America Phase II Reporting (47 CFR § 54.313(e))

- <2017> 3rd year Broadband Service Certification ☐
- <2018> 5th year Broadband Service Certification ☐
- <2019> Interim Progress Certification ☐
- <2020> Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year. ☐

- <2021> Interim Progress Community Anchor Institutions

Name of Attached Document Listing Required Information

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(3000) Rate Of Return Carrier Additional Documentation
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

| | |
|---|----------------------|
| <010> Study Area Code | 351225 |
| <015> Study Area Name | LEHIGH VALLEY COOP |
| <020> Program Year | 2015 |
| <030> Contact Name - Person USAC should contact regarding this data | Tom Campbell |
| <035> Contact Telephone Number - Number of person identified in data line <030> | 6516218511 ext. |
| <039> Contact Email Address - Email Address of person identified in data line <030> | tcampbell@otcpas.com |

CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3010) Progress Report on 5 Year Plan
Milestone Certification (47 CFR § 54.313(f)(1)(i))

Name of Attached Document Listing Required Information

(3011) Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313 (f)(1)(ii), the carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year. ☐

(3012) Community Anchor Institutions (47 CFR § 54.313(f)(1)(ii))

Name of Attached Document Listing Required Information

(3013) Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2))

(Yes/No)

☒ Yes ☒ No

(3014) If yes, does your company file the RUS annual report

(Yes/No)

☒ Yes ☒ No

Please check these boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:

(3015) Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)

☒

(3016) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

☒

(3017) If the response is yes on line 3014, attach your company's RUS annual report and all required documentation

3512251a3017.pdf

Name of Attached Document Listing Required Information

(3018) If the response is no on line 3014, is your company audited?

(Yes/No)

☒ Yes ☒ No

If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:

(3019) Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications ☐

(3020) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows ☐

(3021) Management letter issued by the independent certified public accountant that performed the company's financial audit. ☐

If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:

(3022) Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers, ☐

(3023) Underlying information subjected to a review by an independent certified public accountant ☐

(3024) Underlying information subjected to an officer certification. ☐

(3025) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows ☐

(3026) Attach the worksheet listing required information

Name of Attached Document Listing Required Information

| | |
|---|--|
| Certification - Reporting Carrier Data Collection Form | FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013 |
|---|--|

| | |
|---|----------------------|
| <010> Study Area Code | 351225 |
| <015> Study Area Name | LEHIGH VALLEY COOP |
| <020> Program Year | 2015 |
| <030> Contact Name - Person USAC should contact regarding this data | Tom Campbell |
| <035> Contact Telephone Number - Number of person identified in data line <030> | 6516218511 ext. |
| <039> Contact Email Address - Email Address of person identified in data line <030> | tcampbell@otcpas.com |

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

| | |
|---|--------------------------------|
| Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients | |
| I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate. | |
| Name of Reporting Carrier: | |
| Signature of Authorized Officer: | Date |
| Printed name of Authorized Officer: | |
| Title or position of Authorized Officer: | |
| Telephone number of Authorized Officer: | |
| Study Area Code of Reporting Carrier: | Filing Due Date for this form: |
| Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001. | |

| | |
|---|--|
| Certification - Agent / Carrier Data Collection Form | FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013 |
|---|--|

| | |
|---|----------------------|
| <010> Study Area Code | 351225 |
| <015> Study Area Name | LEHIGH VALLEY COOP |
| <020> Program Year | 2015 |
| <030> Contact Name - Person USAC should contact regarding this data | Tom Campbell |
| <035> Contact Telephone Number - Number of person identified in data line <030> | 6516218511 ext. |
| <039> Contact Email Address - Email Address of person identified in data line <030> | tcampbell@otcpas.com |

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

| Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier | |
|--|--|
| I certify that (Name of Agent) <u>Tom Campbell</u> is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate. | |
| Name of Authorized Agent: | Tom Campbell |
| Name of Reporting Carrier: | LEHIGH VALLEY COOP |
| Signature of Authorized Officer: | CERTIFIED ONLINE Date: 06/20/2014 |
| Printed name of Authorized Officer: | James Suchan |
| Title or position of Authorized Officer: | CEO |
| Telephone number of Authorized Officer: | 5153592211 ext. |
| Study Area Code of Reporting Carrier: | 351225 Filing Due Date for this form: 06/30/2014 |
| Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001. | |

TO BE COMPLETED BY THE AUTHORIZED AGENT:

| Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier | |
|--|--|
| I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate. | |
| Name of Reporting Carrier: | LEHIGH VALLEY COOP |
| Name of Authorized Agent or Employee of Agent: | Tom Campbell |
| Signature of Authorized Agent or Employee of Agent: | CERTIFIED ONLINE Date: 06/20/2014 |
| Printed name of Authorized Agent or Employee of Agent: | Tom Campbell |
| Title or position of Authorized Agent or Employee of Agent: | Consultant |
| Telephone number of Authorized Agent or Employee of Agent: | 6516218511 ext. |
| Study Area Code of Reporting Carrier: | 351225 Filing Due Date for this form: 06/30/2014 |
| Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001. | |

REDACTED – FOR PUBLIC INSPECTION

Attachments

REDACTED – FOR PUBLIC INSPECTION

(700) Price Offerings Including Voice Rate Data
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

| | | |
|-------|-----------------|--------|
| <010> | Study Area Code | 351225 |
|-------|-----------------|--------|

| <015> Study Area Name | LEHIGH VALLEY COOP |
|-----------------------|--------------------|
|-----------------------|--------------------|

| | |
|--------------------|------|
| <020> Program Year | 2015 |
|--------------------|------|

| | | |
|-------|---|--------------|
| <030> | Contact Name - Person USAC should contact regarding this data | Tom Campbell |
|-------|---|--------------|

<035> Contact Telephone Number - Number of person identified in data line <030> 6516218511 ext.

<039> Contact Email Address - Email Address of person identified in data line <030> tcampbell@otcpas.com

| | |
|---|----------|
| <701> Residential Local Service Charge Effective Date | 1/1/2014 |
|---|----------|

<702> Single State-wide Residential Local Service Charge

<703>

[illegible]

REDACTED – FOR PUBLIC INSPECTION

(710) Broadband Price Offerings
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

| | | |
|-------|---|----------------------|
| <010> | Study Area Code | 351225 |
| <015> | Study Area Name | LEHIGH VALLEY COOP |
| <020> | Program Year | 2015 |
| <030> | Contact Name - Person USAC should contact regarding this data | Tom Campbell |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 6516218511 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | tcampbell@otcpas.com |

<711>

[illegible]

REDACTED – FOR PUBLIC INSPECTION

(800) Operating Companies
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

| | | |
|-------|---|----------------------|
| <010> | Study Area Code | 351225 |
| <015> | Study Area Name | LEHIGH VALLEY COOP |
| <020> | Program Year | 2015 |
| <030> | Contact Name - Person USAC should contact regarding this data | Tom Campbell |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 6516218511 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | tcampbell@otcpas.com |

| | | |
|-------|-------------------|--|
| <810> | Reporting Carrier | Valley Coop Telephone Association |
| <811> | Holding Company | Lehigh Valley Coop Telephone Association |
| <812> | Operating Company | Valley Coop Telephone Association |

| <813> | <a1> | <a2> | <a3> |
|-------|-------------------|------------|---|
| | Affiliates | SAC | Doing Business As Company or Brand Designation |

Hamilton County Wireless
RSA 10

359131

REDACTED – FOR PUBLIC INSPECTION

SAC: 351225

State: IA

LeHigh Valley Coop

Form 481 Line No. 112 Five Year Service Quality Improvement Plan

ATTACHMENT REDACTED IN ENTIRETY

SAC: 351225

State: IA

LeHigh Valley Coop

Form 481 Line No. 510 Compliance with Service Quality Standards and Consumer Protection

FCC Form 481, Line 510: Certification of Compliance with Applicable Service Quality Standards and Consumer Protection Rules

Iowa Administrative Code §199-22.6 requires an ETC to certify in its annual report that it is complying with applicable service quality standards and consumer protection rules. The ETC will measure its service connection, held order, and service interruption performance monthly according to this section. LeHigh Valley Coop certifies that it has complied with these requirements and will continue to comply with these requirements.

LeHigh Valley Coop is in compliance with Federal CPNI rules, Red Flag Rules and other Federal and State requirements governing the protection of Customer's privacy.

SAC: 351225

State: IA

LeHigh Valley Coop

Form 481 Line No. 610 Description of Functionality in Emergency Situations

Iowa Administrative Code §199-22.6(5) requires an ETC to certify in its annual report that it is complying with provisions to meet emergencies including but not limited to the provision of emergency power. Each central office shall contain a minimum of two hours of battery reserve and for offices without permanently installed emergency power facilities, there shall be access to a mobile power unit with enough capacity to carry the load which can be delivered on reasonably short notice and readily connected. LeHigh Valley Coop certifies that it has complied with these requirements and will continue to comply with these requirements.

- LeHigh Valley Coop has informed employees as to the procedures to be followed, including reasonable rerouting of traffic around damaged facilities and the deployment of emergency power, in the event of emergency in order to prevent or mitigate interruption or impairment of telecommunications service.

SAC: 351225

State: IA

LeHigh Valley Coop

Form 481 Line No. 1010 Descriptive document for Voice Services Rate Comparability

Line 1010 – Description of Voice Services Rate Comparability: Provide a detailed description of how your pricing of fixed voice services is no more than two standard deviations above the applicable national average urban rate for voice service, as published annually by the Wireline Competition Bureau, as required in 47 C.F.R. § 54.313(a)(10).

On March 20, 2014 the Wireline Competition Bureau announced results of the Urban Rate Survey for Voice Services; as part the FCC Public Notice DA 14-384. Referenced in this public notice are the results required to meet the rate comparability as noted:

“Based on the survey responses, the Bureau also calculated the reasonable comparability benchmark for voice services to be \$46.96. 9

9. Id. at 17694, para. 84.”

As required LeHigh Valley Coop hereby certifies that its current fixed voice services for residential subscribers as defined in the USF/ICC Transformation Order is below \$46.96.

SAC: 351225

State: IA

LeHigh Valley Coop

Form 481 Line No. 1010 Descriptive document for Voice Services Rate Comparability

Line 1010 – Description of Voice Services Rate Comparability: Provide a detailed description of how your pricing of fixed voice services is no more than two standard deviations above the applicable national average urban rate for voice service, as published annually by the Wireline Competition Bureau, as required in 47 C.F.R. § 54.313(a)(10).

On March 20, 2014 the Wireline Competition Bureau announced results of the Urban Rate Survey for Voice Services; as part the FCC Public Notice DA 14-384. Referenced in this public notice are the results required to meet the rate comparability as noted:

“Based on the survey responses, the Bureau also calculated the reasonable comparability benchmark for voice services to be \$46.96. 9

9. Id. at 17694, para. 84.”

As required LeHigh Valley Coop hereby certifies that its current fixed voice services for residential subscribers as defined in the USF/ICC Transformation Order is below \$46.96.

SAC: 351225

State: IA

LeHigh Valley Coop

Form 481 Line No. 1210 Lifeline Plans Terms and Conditions

Lifeline Telephone Assistance Program

Financial assistance through the Lifeline program is available to help eligible Iowans afford and maintain basic telephone service. Lifeline participation enables Iowans to stay connected to jobs, family, community resources, and government and emergency services. Lifeline is a federal government program that assists qualified Iowans by providing a monthly credit of \$9.25 on the local telephone bill.

The Lifeline program has recently been streamlined by the Federal Communications Commission. Lifeline benefits are now limited to one wire line or wireless phone per qualified household. Households currently receiving more than one Lifeline service must select a single Lifeline service provider and de-enroll from the program with any other provider(s). Households eligible for or already receiving Medicaid, the Supplemental Nutrition Assistance Program, Supplemental Security Income Program, Federal Public Housing Assistance Program, Low-Income Home Energy Assistance Program, Temporary Assistance to Needy Families Program, or the National School Lunch Program may qualify. Consumers may also qualify based on their level of income. For more information, please see the 2013 Lifeline Week news release.

A Lifeline application form is available from your local telephone service provider, the Iowa Utilities Board, or most Community Action Agencies in the state. To apply, simply complete the application form and then return it to your chosen participating provider. Additionally, residents of Tribal lands who are eligible for Lifeline, should check with their local telecommunications provider to inquire about additional benefits, including potential Link-Up Telephone installation benefits.

Information about the number of customers receiving Lifeline assistance is reported by each Iowa telephone company. For more information, call the Iowa Utilities Board (IUB) toll free at 1-877-565-4450, or visit www.fcc.gov/lifeline or www.usac.org

Number of local minutes provided: Unlimited local calling

Additional charges for toll calls: Toll calls are billed at carriers' standard rates

REDACTED – FOR PUBLIC INSPECTION

SAC: 351225

State: IA

LeHigh Valley Coop

Form 481 Line No. 3017 RUS Annual Report

ATTACHMENT REDACTED IN ENTIRETY